

EXHIBIT 3

Timothy M. Stubson, Wyo. Bar No. 6-3144
 Brandon E. Pryde, Wyo. Bar No. 8-6883
 Holly L. Tysse, Wyo. Bar No. 7-5553
 Crowley Fleck PLLP
 111 West 2nd Street, Suite 220
 Casper, WY 82601
 (P) 307-232-6901
tstubson@crowleyfleck.com
bpryde@crowleyfleck.com
htysse@crowleyfleck.com

Eugene M. LaFlamme (Admitted pro hac vice)
 Jared B. Giroux (Admitted pro hac vice)
 Jillian L. Lukens (Admitted pro hac vice)
 McCoy Leavitt Laskey, LLC
 N19 W24200 Riverwood Drive, Suite 125
 Waukesha, WI 53188
 (P) 262-522-7000
elaflamme@MLLlaw.com
jgiroux@MLLlaw.com
jlukens@MLLlaw.com

*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)
)
 Plaintiffs,)
)
 v.)
)
 WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)
)
 Defendants.)

Case No. 2:23-cv-00118-KHR

**DEFENDANTS JETSON
 ELECTRIC BIKES, LLC AND
 WALMART INC.'S TRIAL
 EXHIBIT LIST, WITH
 PLAINTIFFS' OBJECTIONS**

WALMART INC. (“Walmart”) and JETSON ELECTRIC BIKES, LLC (“Jetson”),
(collectively “Defendants”), by and through their attorneys, Crowley Fleck PLLP and McCoy

Leavitt Laskey LLC, for their trial exhibit list state as follows:

Exhibit No.	Description	File Name	Objections (Cite Fed.R.Evid)	Category A, B, C	Offered	Admit/ Not Admitted (A)-(NA)
500	Plasma Manual (Jetson 0001-0021)			A		
501	Plasma Warning Labels (Jetson 0022-0023)			A		
502	Consumer Testing Laboratories report (WM-Wadsworth 00015-00112)			A		
503	TestCoo Sample Plasma Report		Rule 403, Rule 802	B		
504	Plasma UL 2272 Certificate of Compliance (Jetson 0574-0575)			A		
505	UL 2272 Plasma Test Record (Jetson 0322-0332)			A		
506	Battery Cell UL 2580 report (Jetson 0311-0321)			A		
507	First Floor Diagram from Gorbett Report			A		
508	Photo of melted smoking shed (M. Wadsworth Dep. Ex. 29)		Rule 403 (Also objecting based upon terminology of what’s depicted in photo, which is subject of Plaintiffs’ Motion in Limine)	B		
509	Photo of bedroom window and smoking shed area (Pasborg Dep. 4)			A		
510	Photo of bedroom window and smoking shed area (Sheaman Dep. 19)			A		
511	Photo of camper (M. Wadsworth Dep. Ex. 35)			A		
512	Photo of garage doors (Pasborg Dep. Ex. 5)			A		

513	Property aerial photo (Pasborg Dep. Ex. 3)			A		
514	Photo of electrical panel (Sheaman Dep. Ex. 21)			A		
515	Matterport screen shots (Robinson Dep. Ex. 14) and other applicable screen shots from Matterport			A		
516	Matterport Diagram			A		
517	CT scan screen shots including: King Dep. Exs. 76, 77, and 80, screen shots from Sudler expert report and other applicable screen shots			A		
518	X-rays of hoverboard and components including King Dep. Ex. 78 and other x-ray images of hoverboard			A		
519	Hoverboard photos including King Dep. Ex. 79, photos from Sudler expert report and other applicable photos of the subject hoverboard			A		
520	Melting Temperature of Common Materials Table (Sudler Report Figure 22)		Rule 403, Rule 802	B		
521	Closed loop electrical system for hoverboard diagram (Sudler Report Figure 20)		Rule 403, Rule 802	B		
522	IEC Internal short circuit test for a cylindrical cell photos (Sudler Report Figure 17)		Rule 403, Rule 802	B		
523	ISC Implantation – Active to Active (Sudler Report Figure 26)		Rule 403, Rule 802	B		
524	Foil to Foil ISC Activation (Sudler Report Figure 27)		Rule 403, Rule 802	B		
525	IECEE Certificate for battery cells (Sudler Report Figure 19)		Rule 403, Rule 802	B		

526	IEC Internal Short Circuit Test (Sudler Report Figure 17)		Rule 403, Rule 802	B		
527	Photos of exemplar hoverboard, battery pack and component parts from King expert file			A		
528	Sudler photos from Oct. 31, 2023 joint evidence exam		Possibly cumulative - Rule 403.	B		
529	Sudler photos from Feb. 29, 2024 joint hoverboard exam		Possibly cumulative - Rule 403.	B		
530	Strandjord arc damage photos from site inspection		Possibly cumulative - Rule 403.	B		
531	Strandjord arc damage photos from Oct. 31, 2023 joint evidence exam		Possibly cumulative - Rule 403.	B		
532	Strandjord exterior house photos		Possibly cumulative - Rule 403.	B		
533	Strandjord electrical panel photos		Possibly cumulative - Rule 403.	B		
534	Strandjord bedroom 4 photos		Possibly cumulative - Rule 403.	B		
535	Strandjord electrical photos from Oct. 31, 2023 joint evidence exam		Possibly cumulative - Rule 403.	B		
536	Strandjord electrical diagram		Rule 403	B		
537	Photo of Wadsworth house from 2018 MLS listing		Rule 401, Rule 403	B		
538	Gorbett timeline		Rule 403	B		
539	Gorbett shed test burn photos and/or video		Rule 401, Rule 403, Rule 802	B		
540	Gorbett thermocouple tree at bedroom doorway graphs (Gorbett Report Figures 18 and 22)		Rule 802	B		
541	Gorbett stills and/or video from computer fire model simulations		Rule 802	B		

542	FDS User's Guide		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
543	FDS Verification Guide		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
544	FDS Validation Guide		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
545	Filas bedroom 4 site photos		Possibly cumulative - Rule 403.	B		
546	Filas exterior house photos		Possibly cumulative - Rule 403.	B		
547	Filas kitchen and hallway photos		Possibly cumulative - Rule 403.	B		
548	Filas shed remains/debris photos		Possibly cumulative - Rule 403.	B		
549	Filas basement photos		Possibly cumulative - Rule 403.	B		
550	Filas refrigerator photos on		Possibly cumulative - Rule 403.	B		
551	Applicable portions of UL 2580		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
552	Applicable portions of UL 2272		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed	Reserve A, B, C		

			exhibit			
553	Applicable portions of NFPA 921		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
554	Applicable portions of NFPA 1033		Rule 106, Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserve A, B, C		
555	Applicable portions of the The Ignition Handbook by Vytenis Babrauskus		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
556	Applicable portions of Smoldering Fires book by Vytenis Babrauskus		Rule 401, Rule 403, Rule 602, Rule 802, Rule 901.	B		
557	Portions of Ashley Merrell body camera video		Rule 106	B		
558	Portions and/or still photos from body camera video that show fire at time first responders arrived		Rule 106	B		
559	Portions of M. Wadsworth recorded interview with Detective Sheaman		Rule 106, Rule 403, Rule 802	B		
560	Portions of Wadsworth children interview with Detective Sheaman		Rule 106, Rule 403, Rule 802	B		
561	Poly Outdoor Storage Drum ("Smoking Shed") product information		Plaintiffs reserve the right to raise objections following review of the proposed exhibit	Reserved A, B, C		
562	The Science Behind the Development and		Rule 401, Rule 403,	B, C		

	Performance of Reduced Ignition Propensity Cigarettes article by Richard Baker, Steven Coburn, Chuan Liu and Kevin McAdam		Rule 602, Rule 802, Rule 901			
563	Activities of Daily Living Questionnaire (Snyder Dep Ex. 67)			A		
564	Applicable portions of Dollar Value of a Day Tables 223, 224, 225		Rule 106	B		
565	OEWS State Occupational Employment and Wage Estimates		Rule 401, Rule 403	B		
566	Rowsey Schedule 1-11D (Rowsey Dep. Ex. 111)		Rule 403, Rule 802	B		
567	Life Care Plan Summary pg. 70-71 (Johnson Dep. Ex. 5)		Rule 403, Rule 802	B		
568	Exemplar Plasma hoverboard		Reserve potential objection until counsel can review the proposed exemplar.	Reserve B		
569	House Rules (Nuttall Dep. Ex. 48)		Rule 401, Rule 403	B		
570	House Diagram (Schulz Dep. Ex. 100)			A		
571	Recs. K.W. Castle Rock Medical Center		Rule 401, Rule 403, Rule 802	B		
572	Recs. G.W. Castle Rock Medical Center		Rule 401, Rule 403, Rule 802	B		
573	Recs. L.W. Castle Rock Medical Center		Rule 401, Rule 403, Rule 802	B		
574	Recs. W.W. Castle Rock Medical Center			A		
575	Recs. L.W. Professional Counseling Services		Rule 401, Rule 403, Rule 802	B		
576	K.W. School Records		Rule 401, Rule 403, Rule 802	B		
577	G.W. School Records		Rule 401, Rule 403, Rule 802	B		
578	L.W. School Records		Rule 401, Rule 403, Rule 802	B		

579	W.W. School Records		Rule 401, Rule 403, Rule 802	B		
580	Schulz invoices		Rule 403, Rule 802	B		
581	King invoices		Rule 403, Rule 802	B		
582	Snyder invoices		Rule 403, Rule 802	B		
583	Demonstrative animations and/or aides		Plaintiffs reserve the right to raise objections following review of the proposed exhibit.	Reserved A, B, C		

Defendants hereby reserve the right to amend this list prior to trial. Defendants further reserve the right to use any of the following:

1. Any and all discovery responses;
2. Any and all documents produced in discovery;
3. Any and all documents obtained through record subpoenas;
4. Any and all pleadings;
5. Any and all exhibits to be used for impeachment or rebuttal;
6. Any and all deposition transcripts or sworn testimony for any witness that has been provided in this case or in other matters;
7. Any and all demonstrative evidence necessary and/or pertaining to any expert witness opinions;
8. Any and all deposition exhibits;
9. Any and all exhibits identified by Plaintiffs; and
10. Any and all documents from any expert files.

Following review of Defendants' Exhibit List, Plaintiffs reserve the right to raise any additional objections following receipt of the physical exhibits.

McCOY LEAVITT LASKEY LLC

Attorneys for Defendants, Jetson Electric Bikes,
LLC and Walmart Inc.

Dated: February 4, 2025

By:



Eugene M. LaFlamme (*pro hac vice*)
Jared B. Giroux (*pro hac vice*)
Jillian L. Lukens (*pro hac vice*)
McCoy Leavitt Laskey, LLC
N19 W24200 Riverwood Drive, Suite 125
Waukesha, WI 53188
(P) 262-522-7000
elaflamme@MLLlaw.com
jgiroux@MLLlaw.com
jlukens@MLLlaw.com

and

Timothy M. Stubson, Wyo. Bar No. 6-3144
Brandon E. Pryde, Wyo. Bar No. 8-6883
Holly L. Tysse, Wyo. Bar No. 7-5553
Crowley Fleck, PLLP
111 West 2nd Street, Suite 220
Casper, WY 82601
(P) 307-232-6901
tstubson@crowleyfleck.com
bpryde@crowleyfleck.com
htysse@crowleyfleck.com